

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' NOTICE OF FILING  
VOTING SYSTEM TEST LABORATORY REPORT**

Pursuant to the Court's September 30, 2020 docket entry, and as discussed in Defendants' Notice of Filing Regarding the Court's Request for Documentation, [Doc. 929], State Defendants provide the following information for the Court. The State's EAC-certified Voting System Test Laboratory, Pro V&V, has completed its letter report regarding the software update to the Dominion ICX BMD which the State Defendants will subsequently file under seal.<sup>1</sup> Pro V&V has recommended that the change be

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<sup>1</sup> Because the Letter Report was issued late this afternoon and counsel has not had sufficient time to confer with their client and Dominion regarding the document, State Defendants have elected to file the document under provisional seal to provide it to the Court as quickly as possible. At minimum, the document contains sensitive information such as the hash value of the

considered “de minimis” per Election Assistance Commission procedures, and verified through their testing that the rendering issue has been resolved. The same Letter Report has been submitted to the EAC for approval.

Respectfully submitted this 2nd day of October 2020,

/s/ Carey Miller

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software which should not be subject to public disclosure as its disclosure could compromise the security of the voting system.

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**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing **STATE DEFENDANTS' NOTICE OF FILING VOTING SYSTEM TEST LABORATORY REPORT** has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Carey Miller  
Carey Miller